

1200 EIGHTEENTH STREET, NW WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301 WWW.HARRISWILTSHIRE.COM

ATTORNEYS AT LAW

February 6, 2006

BY ECFS

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12 Street, SW Washington, DC 20554

Re:

Certification of CPNI Filing (February 6, 2006)

EB Docket No. 06-36

EB-06-TC-060

Dear Ms. Dortch:

Attached please find a copy of the compliance certification Equivoice, Inc. The certificate and statement are integrated into the same document. Pursuant to the Commission's public notice dated February 2, 2006 (DA 06-258), a copy of this letter and the certification are being filed electronically in EB Docket No. 06-36.

Please contact me if there are any questions.

Sincerely,

John T. Nakahata

Counsel to Equivoice, Inc.

Enclosure

cc: Richard Pierce, Vice President, Equivoice, Inc.

SECTION 64.2009(E) CERTIFICATION OF EQUIVOICE, INC.

- I, Richard Pierce, Vice-President of Equivoice, Inc. ("Equivoice"), hereby declare under penalty of perjury:
- 1. I have personal knowledge of Section 222 of the Communications Act and of the Commission's Part 64, Subpart U rules governing treatment of customer proprietary network information ("CPNI"), and of Equivoice's operating procedures concerning treatment of CPNI. Given the nature and scope of Equivoice's operations and its marketing practices, those operating procedures are adequate to ensure compliance with the Commission's rules concerning CPNI. Specifically:
- 2. Equivoice does not permit disclosure of CPNI to third parties, and does not provide CPNI to its sales agents or representatives.
- 3. Equivoice does not use CPNI to market its services outside of the service basket to which the customer subscribes. Equivoice sells long distance services. The bulk of these services are sold in the form of calling cards, which do not generate individually identifiable information. The remaining long distance services are sold to business customers, with service to a few incidental residential lines. Although Equivoice also provides Internet access to some of its business customers, it does not use CPNI to market Internet access.

4. Equivoice has advised all employees of its requirements that CPNIU be treated confidentially and not be disclosed to third parties. Equivoice has advised all employees that failure to comply with these policies may lead to discipline up to and including immediate termination of employment.

Richard Pierce